

**Subject: General Staff Responsibilities –CPA and Non-CPA**

Effective Date: October 1, 2005

Revised from: October 1, 2004

**Policy:** Competent professional authorities (CPA) are required by federal regulation to provide certain levels of services related to certification, nutrition education, risk assessment, and food package selection. A CPA is defined in Kansas as a licensed physician, licensed dietitian, registered nurse, or registered physician's assistant. Non-CPA personnel shall not complete portions of the above services that are beyond what is allowed by federal regulation. The State WIC Office has established six levels of staff responsibilities based upon these limitations.

The table below briefly defines the limitation of various levels of staff personnel. The levels are defined as:

Level 1:	Receptionist <b>Non CPA</b>	Completes prescreen of applicants. Reviews scheduled appointments and make new appointments. Promotes breastfeeding.
Level 2:	Breastfeeding Peer Counselor <b>Non CPA</b>	May provide all the services of Level 1. Provides counseling and support to breastfeeding dyads.
Level 3:	Clerk <b>Non CPA</b>	May provide all the services of Level 1. Assists with intake portion of the certification, issues checks, and provides nutrition education information to clients from pamphlets or newsletters. Provides referrals as needed.
Level 4:	Clerk with Specialized Training, LPN, Registered Dietetic Technician <b>Non CPA</b>	May provide all the services of Level 1 and 3. Takes anthropometric and hematological measurements at certification and subsequent client visits as needed. Makes allowed food package changes.
Level 5:	Registered Nurse, Nurse Practitioner, Physician Assistant <b>CPA</b>	May provide all the services of Level 1, 3, and 4. Certifies applicants/clients including assessment of nutrition risk, nutrition counseling, and assigning food packages. Completes Flowsheet and care plan for clients. Assists in low risk follow-up nutrition education classes and 2C visits. Works with other community programs to integrate WIC nutrition services.
Level 6:	Licensed/Registered Dietitian <b>CPA</b>	May provide all the services of Level 1, 3,4, and 5. Nutrition provider for high-risk clients. As needed, reinforces medical care plan provided by the health care system.

**Reference: § 246.2, 246.7, 246.10, 246.11, WIC Nutrition Services Standards, Standard 1, 3, 10, 12, 13, & 19 (USDA Publication, October 2001)**

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**Procedure:**

The following tables define the roles of Level 1 through Level 6 staff in more detail. Each table reflects the limitations of the particular staff involved throughout the WIC service:

**TABLE 1**

<b>NUTRITION SERVICE</b>	<b>LEVEL 1 Receptionist Non CPA</b>
<b>Assessment</b>	<ul style="list-style-type: none"><li>• Prescreens applicants/clients for WIC services</li></ul>
<b>Education</b>	<ul style="list-style-type: none"><li>• Assists staff in providing general information in pamphlets and newsletters about WIC services</li><li>• Promotes breastfeeding as preferred infant feeding method</li><li>• Creates a client and child-friendly environment</li></ul>
<b>Record Keeping</b>	<ul style="list-style-type: none"><li>• Collects and records routine information in KWIC</li><li>• Schedules appointments</li><li>• Distributes appointment letters to clients for visits</li></ul>
<b>Outreach</b>	
<b>Staff Requirements</b>	<ul style="list-style-type: none"><li>• Completes KWIC Training Modules based on job duties</li></ul>
<b>Continuing Education Requirement</b>	<ul style="list-style-type: none"><li>• None</li></ul>

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**TABLE 2**

**In addition to the items in Level 1, the staff may also complete the following:  
Refer to Breastfeeding Promotion and Support Policy in PPM**

<b>NUTRITION SERVICE</b>	<b>LEVEL 2 Breastfeeding Peer Counselor Non CPA</b>
<b>Assessment</b>	
<b>Education</b>	<ul style="list-style-type: none"> <li>• Provides peer counseling and breastfeeding support to pregnant women and breastfeeding dyads.</li> <li>• Provides appropriate referrals.</li> </ul>
<b>Record Keeping</b>	<ul style="list-style-type: none"> <li>• Records in KWIC, follow-up contacts with clients, as appropriate</li> </ul>
<b>Outreach</b>	
<b>Staff Requirements</b>	<ul style="list-style-type: none"> <li>• Completes KWIC Training Modules based upon job duties. Completes breastfeeding peer counselor training course</li> </ul>
<b>Continuing Education Requirement</b>	<ul style="list-style-type: none"> <li>• Attends job related continuing education provided by Local Agency and annual breastfeeding training by the State Agency.</li> </ul>

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In addition to the items in Level 1, the staff may also complete the following. This does not include the specific duties of the Breastfeeding Peer Counselor as outlined in Level 2.

<b>NUTRITION SERVICE</b>	<b>LEVEL 3 Clerk Non CPA</b>
<b>Assessment</b>	<ul style="list-style-type: none"> <li>• Explains procedure for collecting measurements to clients</li> <li>• Completes the intake portion of certifications</li> </ul>
<b>Education</b>	<ul style="list-style-type: none"> <li>• Explains WIC services to clients</li> <li>• Assists nutrition staff in providing general information in pamphlets and newsletters about healthful foods, food buying and food preparation</li> <li>• Assists CPA in nutrition education activities</li> <li>• Assists in preparation of materials for low risk nutrition education</li> <li>• Orders and maintains materials/aids and supplies</li> <li>• Provides appropriate referrals</li> </ul>
<b>Record Keeping</b>	<ul style="list-style-type: none"> <li>• Assists with the issuing of, and security for WIC checks and stubs</li> <li>• Assists in tracking those attending second contact classes and appointments</li> <li>• Distributes appointment letters clients for visits and missed appointments</li> <li>• Records follow-up contacts with clients, as appropriate</li> <li>• Adjusts the Flow sheet as needed during certification period</li> </ul>
<b>Outreach</b>	<ul style="list-style-type: none"> <li>• Provides community outreach as appropriate</li> </ul>
<b>Staff Requirements</b>	<ul style="list-style-type: none"> <li>• Completes KWIC Training Modules based on job duties</li> </ul>
<b>Continuing Education Requirement</b>	<ul style="list-style-type: none"> <li>• Receives a minimum of 2 education opportunities per year consistent with job responsibilities</li> </ul>

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In addition to the items in Level 1 and 3, the staff may also complete the following. This does not include the specific duties of the Breastfeeding Peer Counselor as outlined in Level 2.

<b>NUTRITION SERVICE</b>	<b>LEVEL 4 Clerk with Specialized Training, LPN, Registered Dietetic Technician, Non CPA</b>
<b>Assessment</b>	<ul style="list-style-type: none"> <li>• Maintains and calibrates equipment</li> <li>• Collects height, weight and blood work data</li> </ul>
<b>Education</b>	<ul style="list-style-type: none"> <li>• Assists or conducts low risk nutrition education classes from lessons approved by the dietitian</li> <li>• Provides breastfeeding counseling and support to WIC families</li> <li>• Makes allowed food package changes</li> </ul>
<b>Record Keeping</b>	<ul style="list-style-type: none"> <li>• Documents measurements (i.e. anthropometrics and blood work) in KWIC or on Measurement Pad</li> </ul>
<b>Outreach</b>	<ul style="list-style-type: none"> <li>• </li> </ul>
<b>Staff Qualifications</b>	<ul style="list-style-type: none"> <li>• Licensed LPN, with the State of Kansas (LPN only), Registered as DTR (Diet Technician only), completed competency training for expanded duties (clerks, med technicians, FACS personnel, etc.)</li> </ul>
<b>Staff Requirements</b>	<ul style="list-style-type: none"> <li>• Completes KWIC Training Modules based on job duties</li> </ul>
<b>Continuing Education Requirement</b>	<ul style="list-style-type: none"> <li>• Receives a minimum of 2 education opportunities per year consistent with job responsibilities</li> </ul>

**Subject: General Staff Responsibilities –CPA and Non-CPA****TABLE 5**

In addition to the items in Level 1, 3 and 4, the staff may also complete the following. This does not include the specific duties of the Breastfeeding Peer Counselor as outlined in Level 2.

<b>NUTRITION SERVICE</b>	<b>LEVEL 5 Registered Nurse, Nurse Practitioner, Physician Assistant CPA</b>
<b>Assessment</b>	<ul style="list-style-type: none"> <li>• Conducts dietary assessment</li> <li>• Assesses for nutritional risks</li> </ul>
<b>Counseling and Education</b>	<ul style="list-style-type: none"> <li>• Provides nutrition counseling to clients/families at certifications</li> <li>• Prescribes appropriate WIC food package</li> <li>• Determines frequency /content of follow-up nutrition education</li> <li>• Provides follow-up nutrition education to low risk clients/families</li> <li>• Monitors client care plan recommendations and referrals at low risk follow-up visits</li> <li>• Authorizes special formula issuance</li> <li>• Prepares nutrition education materials/aids to support lesson</li> <li>• Provides in-service education as needed</li> </ul>
<b>Record Keeping</b>	<ul style="list-style-type: none"> <li>• Completes the Flowsheet for clients at the certification visit</li> </ul>
<b>Consultation</b>	<ul style="list-style-type: none"> <li>• Consults with health care providers as appropriate to develop care plan</li> <li>• Coordinates client care with other health care providers to improve health care outcomes</li> </ul>
<b>Planning &amp; Evaluation</b>	<ul style="list-style-type: none"> <li>• Assists the dietitian with development, implementation and evaluation of Nutrition Services Plan</li> <li>• Assists in planning, implementing and evaluating community interventions</li> </ul>
<b>Staff Qualifications</b>	<ul style="list-style-type: none"> <li>• Licensed RN, ARNP, PA with the State of Kansas</li> </ul>
<b>Staff Requirements</b>	<ul style="list-style-type: none"> <li>• Completes KWIC Training Modules based upon job duties</li> </ul>
<b>Continuing Education Requirement</b>	<ul style="list-style-type: none"> <li>• Receives a minimum of 2 education opportunities per year consistent with job responsibilities</li> </ul>

**Subject: General Staff Responsibilities –CPA and Non-CPA****TABLE 6**

In addition to the items in Level 1, 3, 4 and 5, the staff may also complete the following. This does not include the specific duties of the Breastfeeding Peer Counselor as outlined in Level 2.

<b>NUTRITION SERVICE</b>	<b>LEVEL 6 Licensed/Registered Dietitian CPA</b>
<b>Assessment</b>	<ul style="list-style-type: none"> <li>• Conducts a needs assessment for the Nutrition Services Plan (Nutrition Services Coordinator only)</li> <li>• Assesses and addresses specialized dietary needs in high-risk clients</li> <li>• Oversees the assessment of the productivity/cost effectiveness of nutrition services with input from other staff (Nutrition Services Coordinator only)</li> <li>• Oversees the compilation, analysis and reporting of health and nutrition data and documents outcomes (Nutrition Services Coordinator only)</li> </ul>
<b>Counseling and Education</b>	<ul style="list-style-type: none"> <li>• Provides nutrition counseling to high-risk clients/families</li> <li>• Assures and coordinates the high risk client's nutrition care needs as identified by the family and health care team</li> <li>• Prepares or approves nutrition education materials/aids, and lesson plans</li> <li>• Plans, conducts and evaluates ongoing nutrition education efforts of the clinic</li> </ul>
<b>Record Keeping</b>	<ul style="list-style-type: none"> <li>• Records outcome of high-risk visits with clients</li> </ul>
<b>Consultation</b>	<ul style="list-style-type: none"> <li>• Implements nutrition protocols and monitors compliance with these standards by all CPA staff</li> </ul>
<b>Planning &amp; Evaluation</b>	<ul style="list-style-type: none"> <li>• Works with Nutrition Services Coordinator to plan, implement and evaluate the Nutrition Services Plan</li> </ul>
<b>Staff Qualifications</b>	<ul style="list-style-type: none"> <li>• Licensed dietitian with the State of Kansas required. Registration with the Commission on Dietetic Registration encouraged</li> </ul>
<b>Staff Requirements</b>	<ul style="list-style-type: none"> <li>• Completes KWIC Training Modules based on job duties</li> </ul>
<b>Continuing Education Requirement</b>	<ul style="list-style-type: none"> <li>• Receives a minimum of 2 education opportunities per year consistent with job responsibilities</li> </ul>